

April 12, 2018

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**Re: EB Docket No. 06-36
ConvergeOne Technology Utilities, Inc. (499 Filer ID 808668)**

Dear Ms. Dortch:

ConvergeOne Technology Utilities, Inc.¹ (“ConvergeOne”) hereby submits this letter to notify the Federal Communications Commission (“FCC” or the “Commission”) that, for the reasons stated herein, Converge is exempt from filing a certification regarding compliance with the rules governing Customer Proprietary Network Information (“CPNI”).

The Commission adopted its CPNI certificate filing requirement in its EPIC CPNI Order, wherein it amended various sections of its CPNI rules, including Section 64.2009(e), which now requires telecommunications carriers subject to its CPNI rules to file annual compliance certifications.² The EPIC CPNI Order contains an exemption for carriers that employ service contracts with business customers that address protection of CPNI and use dedicated account representatives as primary contacts for their business customers (“Business Customer Exemption”).³

ConvergeOne qualifies for the Business Customer Exemption. Specifically ConvergeOne: (a) serves business customers exclusively; (b) utilizes customer service agreements that contain CPNI protection terms; and (c) employs dedicated account representatives as principal contacts for its customers.⁴ ConvergeOne, previously named RGT

¹ ConvergeOne has filed this letter previously as RGT Utilities, Inc. (499 Filer ID 808668), RGT Utilities of California, Inc. (499 Filer ID 823312), and Rockefeller Group Communications, Inc. (499 Filer ID 828224). However, these entities were consolidated into RGT Utilities, Inc., and subsequently renamed ConvergeOne Technology Utilities, Inc. Consequently, ConvergeOne was not included in filings for prior years.

² See Implementation of the Telecommunications Act of 1996: Telecommunications Carriers’ Use of Customer Proprietary Network Information and Other Customer Information, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007), ¶¶ 51-53 (“EPIC CPNI Order”).

³ Id. at ¶ 25.

⁴ ConvergeOne’s customers are able to reach their account representatives without going through a call center.

Marlene H. Dortch, Secretary
Federal Communications Commission
Page 2 of 2

Utilities, Inc. and RGT Utilities of California, Inc., so informed the Commission in letters submitted to the Enforcement Bureau on September 16, 2008;⁵ however, out of an abundance of caution ConvergeOne is notifying the Commission that ConvergeOne's representations in those letters remain accurate, and that ConvergeOne is qualified for the Business Customer Exemption.

Although the Business Customer Exemption exempts ConvergeOne from the rules adopted in the EPIC CPNI Order, ConvergeOne remains committed to protecting its customers' CPNI in compliance with Section 222 of the Communications Act of 1934, as amended⁶ and applicable FCC rules.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact James A. Barnett at jbarnett@venable.com or 202.344.4695.

Respectfully submitted,

ConvergeOne Technology Utilities, Inc.

By: 
Name: John Tarduno
Title: Vice President

⁵ See Letter to Marcy Greene, Deputy Chief, Response to CPNI Compliance Inquiry by RGT Utilities, Inc., File No. EB-08-TC-5139 (via e-mail, Sept. 16, 2008); Letter to Marcy Greene, Deputy Chief, Response to CPNI Compliance Inquiry by RGT Utilities of California, Inc., File No. EB-08-TC-5138 (via e-mail, Sept. 16, 2008).

⁶ 47 U.S.C. § 222.